

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ROBERT BOWERS

Criminal No. 18-292

**UNITED STATES' NOTICE OF THE PARTIES' INABILITY TO REACH  
JOINT STIPULATIONS FOR THE GUILT PHASE OF TRIAL**

AND NOW comes the United States of America, by its attorneys, Troy Rivetti, Acting United States Attorney for the Western District of Pennsylvania, Soo C. Song, Eric G. Olshan, and Nicole Vasquez Schmitt, Assistant United States Attorneys for said district, Mary J. Hahn, Trial Attorney, Civil Rights Division, and Barry K. Disney, Trial Attorney, Capital Case Section, and respectfully files this Notice of the Parties' Inability to Reach Joint Stipulations for the Guilt Phase of Trial:

On April 3, 2023, this Court directed the parties to file joint stipulations for the guilt phase of trial by April 14, 2023. Doc. No. 1084.

Unfortunately, despite best efforts by counsel for the United States to reach consensus with defense counsel on common, non-controversial stipulations that are routinely used in federal criminal prosecutions—such as authenticity of records and chain of custody—the parties were unable to agree to any joint stipulations.

Accordingly, the United States hereby provides notice that it will be required to supplement its witness list with certain additional witnesses, including some document custodians, and will file an additional motion in limine addressing legal issues regarding authenticity and chain of custody.

Respectfully submitted,

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